

EXHIBIT 12
[REDACTED VERSION OF
DOCUMENT SOUGHT TO BE SEALED]

1 UNITED STATES DISTRICT COURT

2 NORTHERN DISTRICT OF CALIFORNIA

3 No. 5:16-cv-00523-RMW

4
5 30(b)(6) DEPOSITION OF SEAGATE TECHNOLOGY, LLC
6 AS GIVEN BY: PATRICK DEWEY
September 7, 2017

7
8 IN RE SEAGATE TECHNOLOGY, LLC
9 LITIGATION

10
11 APPEARANCES:

12 AXLER GOLDICH, LLC
13 By Marc A. Goldich, Esq.
Matthew Strout, Esq.
14 1520 Locust Street, Suite 301
Philadelphia, Pennsylvania 19102
267.534.7400
15 mgoldich@axgolaw.com
mstrout@axgolaw.com
16 Appearing on behalf of Plaintiffs

17 SHEPPARD MULLIN
18 By Anna S. McLean, Esq.
Four Embarcadero Center, 17th Floor
San Francisco, California 94111-4109
19 415.434.9100
amclean@sheppardmullin.com
20 and
Mukund Sharma, Esq.
21 379 Lytton Avenue
Palo Alto, California 94301-1479
22 msharma@sheppardmullin.com
Appearing on behalf of Seagate
23 Technology, LLC

1

(b) [REDACTED]

10/10/2016

Q Okay. You said "mat testing." Do you --

is that short for maturity testing?

(A) I think so, yeah.

Q Okay.

(A) Yeah. It's part of the Reli suite of

tests. You'll find a lot of different names used

describing that.

Q Okay. And so those are the kinds of tests

that are performed during development to -- to assess

whether a drive has reached certain goals; is that

correct?

A Yes.

Q Okay. And just correct me if I -- if I

have this right based on what you just said, that

depending on the results of mat testing, you could

actually move up the development or even eliminate

certain stages of development of a drive.

A You can.

Q Okay. It actually means you're ahead of

schedule, right?

A You can -- I've been on programs where we

have not had to have all of the phases because you

are ahead, yes.

Q [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

1



© 2006 Pearson Education, Inc.



10/10/2019

[illegible]

10/10/2019

Q Okay. Other than those three, what --

what sort of tests are performed on the drives during

development?

A A series of tests that measure the drive

(against specifications.) (It's referred to in our

language as DMT, and it's design maturity testing.

(So in those tests we look at things like power

consumption, acoustics, the thermal map of the drive,

1 how it reacts in shock and vibe, and verifying that
[REDACTED] it meets specs to those events. [REDACTED] So a lot of the speed
[REDACTED] verification beyond the AFP and MTBF and DPPM.
[REDACTED] [REDACTED] And you answered my next question, which
[REDACTED] was going to be, are those tests performed to assess
[REDACTED] whether the drive is meeting the specifications that
[REDACTED] are contemplated by the core team contract?

[REDACTED] A [REDACTED] yes.

[REDACTED] Q [REDACTED] Okay.

[REDACTED] A [REDACTED] It's repeated many times.

[REDACTED] Q [REDACTED] Meaning the tests are repeated many times?

[REDACTED] A [REDACTED] The test measurement. As I described the
[REDACTED] run/break/fix cycle, each time we subject them
[REDACTED] against its specs and its MTBF and DPPM, and that
[REDACTED] gives us the feedback to mature.

[REDACTED] [REDACTED]
[REDACTED]
[REDACTED]

[REDACTED] [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] [REDACTED]

[REDACTED]
[REDACTED] [REDACTED]
[REDACTED]
[REDACTED]

1

A) [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Q Okay. Do you recall why more testing

needed to be done?

A Yes, and certainly refreshed by looking at

this. I will refer you to where it says, "Drive

Development Phase: Gen 2.]

Q Yes.

A That's a reference to that life cycle of

the development. And if you look at the graph right

below it, it lists essentially from Phase 0 through

many of the generations or stages. And then you can

see its proximity to CTU, Disty, and OEM approval, is

what is being referred to there.

So as we mature the drive, we make a

measure of how it's performing against the specs and

the MTBF, AFR, DPPM. And at that phase, Gen 2, we

were less than a CTU, Disty, and OEM level of

performance for MTBF.

So what I was communicating from this

document was a weekly review with our executive team

that we had put more drives into a regression test

with improvements in the test process in an effort to

learn are we making improvements and strides towards

improving those.

So this is before any ship approval. This

is as we were maturing the drive.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

1 STATE OF COLORADO)

2) ss. REPORTER'S CERTIFICATE

3 COUNTY OF DENVER)

4 I, Pamela J. Hansen, do hereby certify that
5 I am a Registered Professional Reporter and Notary
6 Public within the State of Colorado; that previous to
7 the commencement of the examination, the deponent was
8 duly sworn to testify to the truth.

9 I further certify that this deposition was
10 taken in shorthand by me at the time and place herein
11 set forth, that it was thereafter reduced to
12 typewritten form, and that the foregoing constitutes
13 a true and correct transcript.

14 I further certify that I am not related to,
15 employed by, nor of counsel for any of the parties or
16 attorneys herein, nor otherwise interested in the
17 result of the within action.

18 In witness whereof, I have affixed my
19 signature this 18th day of September, 2017.

20 My commission expires September 3, 2018.

21
22 _____
23 Pamela J. Hansen, CRR, RPR, RMR
24 216 - 16th Street, Suite 600
25 Denver, Colorado 80202